Locked Bag 14051
Melbourne City Mail Centre
Victoria 8001 Australia
T: 1300 360 795
www.ausnetservices.com.au

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Mr Richard Owens
AEMC Senior Director
Australian Energy market Commission

Via email Richard.Owens@aemc.gov.au
Copy: Kate.Reid@aemc.gov.au
Elisabeth.Ross@aemc.gov.au

Richard

Metering Contestability Rule change – drafting input

As we have worked through the Metering Contestability Rule change analysis, and contributed to the ENA and Victorian submissions, and more recently to the AEMO process/procedure workshops, there has been a growing list of identified drafting and application issues with the proposed Rules drafting which have appeared on my hard copy of the Rules.

Generally those with broad DNSP and regime impacts have already been fed into the Rules consideration through the DNSP and ENA submissions. However a number did not "make the cut" to be included. Nevertheless they remain as drafting and lesser application issues.

Some other items have been identified more recently.

Chapter 7 is a very detailed Chapter and impacts directly on Market Service processes and procedures. Getting the drafting as correct and unambiguous as possible is important in providing a consistent basis for these processes and procedures. Hence I have been concerned re this growing list of un-submitted Rules issues. I have now taken the time to put these in a table for consideration of the AEMC drafting team. Many of these have hopefully picked up by others and a number have already been noted in the distributor submissions. Some are minor, some are long standing Chapter 7 drafting issues, and, others more recently added to my list, could have real impact on the contestable regime.

If you or your team want to discuss any of these give me a call on 03 9695 6629.

Sincerely,

Peter Ellis
Network Market Services Manager
AusNet Services

General Comments: P:\Electricity Documents\National SMART\Contest Rule\Rules Drafting Issues v4.docx		
i)	I have attempted to list all identified issues but have not provided more than minimum detail where these issues have been included in the Victorian Distributor submission and/or the ENA submission (although my detailed knowledge of the ENA response is limited).	
ii)	Not all these issues necessarily have an impact on the Distributors. Some identify inconsistencies and drafting errors which are not a good look in what is the key governing document for the retail market. These errors sometimes come back to bite us later.	
iii)	AEMO has an obligation to review the meter test requirements in Chapter 7 every 5 years. This review has been carried out by AEMO and the Metrology Reference Group, most recently about 6 8 months ago, but the changes have not been incorporated in the Rules because of other Rules changes being considered at the time. Although the revisions proposed are not major with respect to forcing change to industry approach and processes, they do overcome a number of inconsistencies and drafting errors which the industry has been working around for some time. This major change to Chapter 7 with respect to metering contestability appears to represent the best opportunity for some time for these changes to be incorporated.	
iv)	The national industry B2B regime does not include the B2B processes and transactions for distributor billing of retailers and for any retailer followup. These processes and transactions are currently covered under Jurisdictional based B2B documents and transactions. The governance structure and processes for network billing are notionally handled under jurisdictional instruments. These structures and processes are somewhat inconsistent and the industry Interface Exchange Committee (IEC) which managers national industry B2B has sought for a number of years to bring them under a national umbrella. However in the legal view of AEMO, the definition of B2B in Chapter 7 currently excludes billing and hence this effort has stalled. Further this lack of coverage in the B2B Section of Chapter 7 for billing is not only a barrier to moving the current network billing to a national governance structure, but would also prevent the potential establishment of processes and B2B transactions for billing for smart meter services. This would appear to be a prime candidate for B2B (volume, need for auditable delivery, standardisation) but this would likely not be possible under the current Chapter 7 drafting (as interpreted by AEMO). This major change to Chapter 7 with respect to metering contestability appears to be a good opportunity for the necessary scope change to B2B to be incorporated.	

Ref No	Clause	Extract	Comment	AusNet Services Ref No
NER				
1.	2.2A.2	**2.4A.2 Eligibility** To be eligible for registration as a *Metering Coordinator*, a person must: (d) have an appropriate security control management strategy and associated infrastructure and communications systems for the purposes of preventing unauthorised local access or remote access to *metering installations*, services provided by *metering installations* and *energy data* held in *metering installations*;	The Victorian DNSP submission highlights the general concern that the relative roles currently in place for metrology where the RP "ensures" that obligations are met and does so by appointing accredited service providers has not been reflected for smart meter services.. The proposed Rules place obligations on the MC not only to ensure but to actually have the systems and processes. This does not match the current metrology regime. Hence the MP/MDP will have the accredited systems for managing metering data, but the MC will have the accredited systems for managing metering services. This results in inconsistency of roles. This clause is a case in point; this requires the MC to have associated infrastructure, rather than as in metrology ensuring the infrastructure is in place. Refer also 7.15.4. At the recent AEMO industry workshop (MSWG+) AEMO gave a view of the service provider regime. Their view would appear to be consistent with the view above and in the Distributor submissions: • MC role is to be responsible for outcomes ie to "ensure" service outcomes are achieved. • The MP and the MDP would be accredited to have the capability to carry out the services as	3

			define in the Rules and Procedures. • The role of maintaining the capability for the back end systems and for B2B/SMP handling would be with the MDP as generally they have the systems capability (the MP is largely associated with the field end) • MC would have an obligation to only engage MP(s) and MDP that are accredited to have the capability. • AEMO audit role would apply to ensuring that the service capability is in place. • Service levels as required by 7.8.3 would be defined as end to end ie service request to service receipt. This being the case it would be expected that the Rules would support and provide the head of power for this regime. As stated above and elsewhere this is not currently the case: • Just as the Rules in Section 7.3.2 place an obligation on the MC to have a Metering Data Provider in place for *metering data services*, the Rules should place a similar obligation for them to have a Metering Data Provider in place with the capability for the *Minimum Services Specification* services and the non-metrology Service Level Procedure (SLP). • Just as the Rules state the capabilities of Metering Providers for metrology services in Schedule 7.2, and the capabilities of Metering Data Providers for metrology services in	

			Schedule 7.3, the Rules should also state the capabilities for Metering Providers and Metering Data Providers with respect to NON metrology services. The obligation in Clause S7.3.4 re security control management is not sufficient. Note in AEMO's view those measurement services in the Minimum Services Specification (eg power quality data) will not be considered as metrology services, and will not be covered in the Metrology Procedure but rather in the SLP only. • For a full rigorous hierarchy of instruments, the Rules with respect to what is included in the SLPs (Section 7.16.6) should be expanded to include the matters with respect to smart meter services which the SLPs must include.	
2.	2.2A.2	**2.4A.2 Eligibility** To be eligible for registration as a *Metering Coordinator*, a person must: (e) have insurance as considered appropriate by *AEMO*; and	The Distributors' responses raised concerns re the network impact of mass load switching. This could cause significant increases in minutes off supply and hence large financial impacts to the Distributor. Presumably this MC insurance is to cover this type of MC impact and resulting cost. This is not clear and to allocate this to AEMO to determine without some policy direction / expectations appears an oversight.	4

3.	7.3.1	**7.3.1 Responsibility of the Metering Coordinator** (a) For the term of its appointment in respect of a *connection point*, the *Metering Coordinator* is the person responsible for the: (1) provision, installation and maintenance of a *metering installation*; **7.8.1 Metering installation requirements** (a) A *Metering Coordinator* must ensure that each *connection point* for which it is responsible has a *metering installation*.	These two clauses appear to duplicate the requirement	5
4.	7.3.1 (a) (2)	Also elsewhere in the proposed Chapter 7 Need for clarity of delivery of metering data, and some basic smart meter services to the Distributor	Refer submissions	6
5.	7.3.2	Appointment of Metering Provider (b) The *Metering Coordinator* must: (1) enter into an agreement with a *Metering Provider* or *Metering Providers*: **Appointment of a Metering Data Provider** (d) Except as otherwise specified in clause 7.5.1(a), the *Metering Coordinator* must, for each *metering installation* for which it is responsible: (1) appoint a *Metering Data Provider* to provide *metering data services*; and	Why does the MC "enter into agreement with an MP" but "appoint a MDP" ? Does this indicate a different approach and obligation for these two relationships?	7

6.	7.3.2	**Appointment of a Metering Data Provider** (d) Except as otherwise specified in clause 7.5.1(a), the *Metering Coordinator* must, for each *metering installation* for which it is responsible: (1) appoint a *Metering Data Provider* to provide *metering data services*; and (2) provide the *financially responsible Market Participant* with the name of the *Metering Data Provider* appointed under subparagraph (1).	Why does the MC need to provide the FRMP with details of the MC's chosen MDP, but not the details of their chosen MP??	
7.	7.3.2	(b) The *Metering Coordinator* must: (1) enter into an agreement with a *Metering Provider* or *Metering Providers*: (ii) for the provision and maintenance of the *metering installation*, where another person has appointed the *Metering Provider* or *Metering Providers* under paragraph (a)(2); and	Paragraph (a) (2) is for the appointment by the owner of a meter provider for installation. Paragraph (a) (2) correctly refers to MP singular, whereas (b) (1) (ii) refers to potentially two installer MPs?!	9

8.	7.3.2	**Appointment of a Metering Data Provider** (d) Except as otherwise specified in clause 7.5.1(a), the *Metering Coordinator* must, for each *metering installation* for which it is responsible: (1) appoint a *Metering Data Provider* to provide *metering data services*; and **7.6.1 Commercial nature of the Metering Coordinator appointment and service provision** (a) A *Metering Coordinator* assumes responsibility in respect of a *connection point* under this Chapter 7 on terms and conditions (including as to price) to be commercially agreed between the *Metering Coordinator* and the *financially responsible Market*	The new clause 7.6.1 introduces a more detailed description of the relationship between the FRMP and the MC than has been used in defining contractual arrangement in the past or in the proposed drafting for example in 7.3.2 (d). It is unclear whether this increased detail has been included to define a relationship which is somehow different to that between the MC and their MP and MDP. If so then what is the difference? If not then the terminology should be the same.	10
9.	7.3.2	Who provides the Minimum Service Specification capability? MC or MP or MDP? Who provides the Shared Market Protocol? MC or MP or MDP? Is there accreditation as per metrology?	Refer submissions	11
10.	7.3.2	(e) (4) where *remote acquisition* is used or is to be used, ensure that a *communications interface* is installed and maintained to facilitate connection to the *telecommunications network*;	The capability to deliver the Minimum Service Specification services (and others) is dependant on not only the remote site end capabilities but also the capacity of the telecommunications network and functionality and capacity of the head end. Refer submissions	12
11.	7.3.2	Or potentially 7.8.3. The proposed MC Rule does not provide any coverage of the need for service delivery capabilities. Having the capability for the smart meters services but no capability to interact with other businesses, and do so in an industry standard manner (whether through the current XML based B2B, or a new format SMP B2B) will not achieve the service outcomes which we understand the AEMC expect.	Refer submissions. Is this to be part of the SMP Rule change?	13

12.	7.3.2	**Access to small customer metering installation** (h) The *Metering Coordinator* must, for each *small customer metering installation* for which it is responsible: (3) not *disconnect* or *reconnect* a *metering installation* except: (i) on the request of the *financially responsible Market Participant* or *Local Network Service Provider*; (ii) where such *disconnection* or *reconnection* is effected via remote access; and (iii) in accordance with the *emergency priority procedures*.	The last point (iii) appear to be incorrectly included. This is not a separate condition on a MC dis/re-connection; whether in an emergency or not, the first two conditions is all that applies. The obligation to follow the *emergency priority procedures* would be clearer drafted into an additional clause (4)	14
13.	7.6.1	**7.6.1 Commercial nature of the Metering Coordinator appointment and service provision** (a) A *Metering Coordinator* assumes responsibility in respect of a *connection point* under this Chapter 7 on terms and conditions (including as to price) to be commercially agreed between the *Metering Coordinator* and the *financially responsible Market Participant* or *large customer* who appoints the *Metering Coordinator* under clause 7.6.2.	i. The detail and terminology here re the "terms and conditions including price" and "commercially agreed" is very inconsistent with the drafting in what is now 7.3.2 re the role of the MC to "appoint" a MP or MDP and "enter into an agreement" with a MP. Does this signify some difference in the relationships between the FRMP and the MC and the MC and their service providers? Probably not, so why the different wording? ii. What does the term "assume responsibility in respect of a connection point under this Chapter 7" mean? Would this be clearer to just reference 7.3.1?	16

14.	7.6.2	(c) The *Market Settlements and Transfer Solution Procedures* may specify that an incoming *Metering Coordinator* is responsible for the *metering installation*: (1) on the day that a *market load* transfers from one *financially responsible Market Participant* to another *financially responsible Market Participant* for the period within that day; or (2) on any other day.	It is unclear what policy position this clause is advocating. Is the AEMC assessment of the MC change approach that is can happen on any day then only (2) is required. If restricted to the FRMP change over date then only (1) is required. The customer and industry impacts of these are very different.	17
15.	7.7.1	**7.7.1 Obligations of financially responsible Market Participants on Metering Coordinator default event and end of contract term** (a) Without limiting the obligations of a *financially responsible Market Participant* under clause 7.2.1(a)(2), the *financially responsible Market Participant* must appoint a new *Metering Coordinator* in respect of a *connection point* in circumstances where: as soon as practicable after the *Metering Coordinator default event* occurs or the period referred to in subparagraph (a)(2) has elapsed (as the case may be).	The role of the RP/MC is critical is maintaining the integrity of the market and metering data (and smart meter services). Hence the Rules should be more explicit in the MC change over timing obligation and/or require this to be defined in an AEMO procedure.	18
16.	7.7.3	**7.7.3 AEMO may issue breach notice** (a) *AEMO* must establish, maintain and *publish* a procedure for the issue of a *Metering Coordinator default notice* in respect of *Metering Coordinators* which incorporates the principles specified in paragraph (b).	Is this a Market Procedure subject to Rules Consultation? This should be clear.	19

17.	7.8.1	**7.8.1 Metering installation requirements** (a) A *Metering Coordinator* must ensure that each *connection point* for which it is responsible has a *metering installation*. (b) A *Metering Coordinator* must ensure that *energy data* held in a *metering installation* for which it is responsible is based on units of watthour (**active energy**) and where required varhour (**reactive energy**). (c) Installation and maintenance of *metering installations* must be carried out only by a *Metering Provider*.	The phrase "The MC must ensure" is missing from (c)"	21
18.	7.8.2	(d) The *Local Network Service Provider* must issue a unique *NMI* for each *metering installation* to the *Metering Coordinator* that is responsible for that *metering installation*. (e) The *Metering Coordinator* must register the *NMI* with *AEMO* in accordance with procedures from time to time specified by *AEMO*.	i) Despite this largely being copied from the previous Rules version these clause do not reflect actual responsibilities and practice. The LNSP establishes a NMI and registers the NMI in MSATS (ie with AEMO) as a result of the FRMPs request via a B2B SO for a new connection (or in NSW for a NMI) (or under NECF potentially the customer's agent). The LNSP does not directly issue the NMI to the MC. ii) Despite the NMI being a "metering identifier" the NMI actually is the identifier of the "connection point". iii) Whilst this Rules change does not incorporate the embedded network changes, the proposal in the case of the embedded network is for the new role of ENM to issue the NMIs for embedded networks.	22, 23, 24

19.	7.8.3	**7.8.3 Small customer metering installations** (a) Except as specified in clause 7.8.4, a *Metering Coordinator* must ensure that any new or replacement *metering installation* in respect of the *connection point* of a *small customer* is a type 4 *metering installation* that meets the *minimum services specification*.	There are no provisions for the MC's MP and/or MDP to be accredited for any aspects of the provision of smart meter services. This does not follow the model which has been in place since market start for metrology where the RP (now MC) ensures the actions and the MP/MDP is accredited for carrying out the actions. Refer comments above on 2.2A.2 and submissions.	25
20.	7.8.3	(b) Except where a *Metering Coordinator* has obtained an exemption under clause 7.8.4 in respect of a *connection point*, a *Metering Provider* must ensure that any *metering installation* installed or proposed to be installed in respect of a *new connection* for a *small customer* at that *connection point* is a type 4 *metering installation* that meets the *minimum services specification*.	The submissions note the desirability of defining smart meter type in the Rules eg type 4B. It is noted that this reduces drafting complexity as "4B" can replace the phrase "metering installation which meets the minimum service specification"	2

21.	7.8.3	(c) *AEMO* must establish, maintain and *publish* procedures relating to the *minimum services specification* that set out for each service specified in the *minimum service specification*: (1) minimum service levels, including service availability and completion timeframes; (2) minimum standards, including completion rates against the service levels and accuracy requirements. (d) The procedures established under paragraph (c) may also include technical requirements of one or more of the services specified in the *minimum services specification*.	The determination of service measures for the smart meter services is critical to achieving the desired outcomes from the N&R rollout. None of the key terms in this critical clause are defined: • minimum service levels • service availability • completion timeframes – presumably end to end but not defined • minimum standards • completion rates • technical requirements Most of these terms have no current formally defined industry meaning and in some cases the equivalent terms in the Victorian Functionality Specification are different. It is possible to guess the intent of some of these, but this is not a desirable situation.	26
22.	7.8.4	Need for recognition of smart type 4 v's current type 4	Refer submissions	2

23.	7.8.4	**7.8.4 Type 4A metering installation** (a) *AEMO* may exempt a *Metering Coordinator* from complying with clause 7.8.3(a) in respect of a *connection point* for one or more periods of up to 5 years each if the *Metering Coordinator* demonstrates to *AEMO's* reasonable satisfaction that there is no existing *telecommunications network* which enables remote access in respect of the *metering installation* at that *connection point*.	i) There would appear to be a need for more Rules prescription of the criteria to be applied by AEMO in granting this exemption. In many cases there will be a series of measures which the MC/MP/MDP could take to gain access to remote connectivity, and the access may be gained at different levels of availability and reliability. The use of the criteria of "existing" would not appear to be sufficient. ii) A clear procedure would then be needed to ensure working level clarity of the AEMO assessment approach. iii) would the exemption apply for 5 years and then a further application would be made for a second 5 year exemption, etc; or would AEMO do an assessment of the likelihood of communications being available and grant a 5, 10, or 15 year etc exemption?? The words are not clear.	27, 28, 29
24.	7.8.5	**7.8.5 Emergency management** (a) The *Metering Coordinator* must ensure that access to the *metering installation*, services provided by the *metering installation* and *energy data* held in the *metering installation* are managed in accordance with the *emergency priority procedures* in the event of an emergency condition as determined in accordance with those *emergency priority procedures*.	It is unclear what emergency would drive a requirement for "special" access to metering data?	30

25.	7.8.5 (b)	(1) the criteria for determining when an emergency condition is present and which *metering installations* will be affected by the emergency condition; and	Under an emergency when the Distributor is utilising load or customer switching for load reduction and load cycling all installations will be potentially be involved. For example it is envisaged that smart meter capabilities will enable the DNSP, looking to minimise the impact of load reduction in an emergency, to switch individual customers rather than at remotely operated network devices. Hence a DNSP could switch off all customers in an area BUT retain the say two or three sensitive loads (eg hospital, fire station, traffic lights) on supply.	31
26.	7.8.5(b)	(2) where a *Metering Coordinator* supplies services to a *Local Network Service Provider* from a *metering installation* that is affected by an emergency condition, which services the *Metering Coordinator* may be required to prioritise at the request of the *Local Network Service Provider*.	i) Under an emergency the required priority would be a must – ie replace "may be required to prioritise" with "must prioritise". ii) The other aspect is that these services must be available 24/7 – the obligation should not be restricted to say business hours.	32,33
27.	7.8.6	(b) A *Metering Coordinator*: (2) must not remove, damage or render inoperable a *network device* that has been installed at or adjacent to a *metering installation* except with the consent of the *Local Network Service Provider*.	The DNSP submissions have made a number of points about the definition and usage of a network device. However this clause appears to leave it somewhat unclear as to when a network's meter becomes a network device. The Rule should state that a network meter becomes a network device at the point in time that a MC determines to install their own market meter whether that be by choice or due to meter failure.	33
28.	7.8.6 (c)	Network device definition and usage	Refer submissions.	34,35, 36, 37 38

29.	7.8.8	**7.8.8 Metering installation types and accuracy** (a) The type of *metering installation* and the accuracy requirements for a *metering installation* which must be installed in respect of each *connection point* are to be determined in accordance with Schedule 7.4. (c) The *Metering Coordinator* must ensure that the accuracy of a type 6 *metering installation* is in accordance with regulations issued under the *National Measurement Act* or, in the absence of any such regulations, with the *metrology procedure*.	i) There is some inconsistency throughout the Rules drafting in that some clauses re requirements are drafted as obligations on a party eg 7.8.8 (c) "the MC must ensure that ….." ; whereas others are no assigned eg 7.8.8 (a). Is this meant to imply a difference in responsibilities between the clauses drafted in these two ways? ii) Why are type 6 meters only targeted in (c)? Surely all meter types must be in accordance to the NMA??	39
30.	7.8.9	(e) A *metering installation* must not be altered or replaced by the *Metering Coordinator* under paragraph (a) until the transfer of the relevant *market load* has been effected by *AEMO* in accordance with the *Market Settlement and Transfer Solution Procedures*.	This clause is the subject of the Meter Churn Rule Change proposal currently under consultation.	-

31.	7.8.10	**7.8.10 Meter installation malfunctions** (a) Unless an exemption is obtained by the *Metering Coordinator* from *AEMO* under this clause 7.8.10, the *Metering Coordinator* must in respect of a *connection point* with: (1) a type 1, 2 or 3 *metering installation*, if a *metering installation malfunction* occurs to the *metering installation*, cause repairs to be made to it as soon as practicable but no later than 2 *business days* after the *Metering Coordinator* has been notified of the *metering installation malfunction*; or (2) a *metering installation* other than the installations referred to in subparagraph (1), if a *metering installation malfunction* occurs to the *metering installation*, cause repairs to be made to it as soon as practicable but no later than 10 *business days* after the *Metering Coordinator* has been notified of the *metering installation malfunction*. ***metering installation malfunction*** The full or partial failure of the *metering installation* in which the *metering installation* does not: (a) meet the requirements of schedule 7.4; or (b) record, or incorrectly records, *energy data*; or (c) allow, or provides for, collection of *energy data*.	i) For a type 1, 2, 3, 4 (type 5 AMI) meter, failure of the meter communications effectively renders the metering installation unable to provide, not only remote read metering data, but also smart meter services. These obligations to return meters to service (or seek exemption) should be explicitly extended to meter communications. ii) The current definition of *meter installation malfunction* refers only to metering data provision, and hence does not recognise that in the smart meter regime continuity of smart meter services will be critical. Hence if a meter failure (or communications failure) renders the MC unable to provide the minimum service capabilities as required by Rule 7.8.3(a) then this is a *meter installation malfunction* which should be rectified in the Rules specified timeframe.	41, 42

32.	7.8.11	**7.8.11 Changes to metering equipment, parameters and settings within a metering installation** The *Metering Coordinator* must ensure that changes to parameters or settings within a *metering installation* are: (a) authorised by *AEMO* prior to the alteration being made; (b) implemented by a *Metering Provider*; (c) confirmed by the *Metering Coordinator* within 2 *business days* after the alteration has been made; and (d) recorded by *AEMO* in the *metering register*.	This Section fails to recognise the wide range of "parameters and settings within a metering installation" which are not metrology based, but which may fundamentally impact the smart meter services provided by the metering installation. We would argue that there should be some fundamental Rules based obligations to advise impacted stakeholders before metering installation changes affecting smart meter services are made, but others might argue that this would be covered by the commercial arrangements in place. Distributors argue that at least some services should be default mandated services. However, either way this Section needs to be explicit with respect to parameters and settings associated with smart meter services.	43
33.	7.11.1	**7.11.1 Metering databases**	There is only one "metering database"	46
34.	7.13.3	**7.13.3 NMI Standing Data** A *Distribution Network Service Provider* must, at the request of a *financially responsible Market Participant*, and within 2 *business days* of the date of the request, provide the *financially responsible Market Participant* with the *NMI Standing Data* for premises identified in the request by reference to the *NMI* for the premises.	Having revised this clause to refer to the "FRMP" rather than "the retailer" the drafting has removed the capability for the DNSP to provide NMI discovery follow-up service to a prospective retailer.	47
35.	7.15.2	(g) A *Metering Coordinator* must not prevent, hinder or otherwise impede a *Local Network Service Provider* from locally accessing a *metering installation* or *connection point* for the purposes of *reconnecting* or *disconnecting* the *connection point*.	There could be a number of reasons beyond re/dis-connection why a DNSP may want access to the metering installation or connection point including for faults, safety inspection, network device installation/maintenance, etc etc. This access should be unrestricted with respect to purpose.	48

36.	7.15.4	(b) the *Metering Coordinator* must ensure that access to services provided by the *metering installation* and *metering data* from the *metering installation* is only given to: (1) in respect of a service listed in the *minimum services specification* in column 1 of table S7.5.1.1 and of *metering data* in connection with that service, an *access party* listed in column 3 of table S7.5.1.1; (2) except as otherwise specified in subparagraph (1), a person and for a purpose to which the *small customer* has given prior consent; or (3) otherwise, a person and for a purpose that is permitted under the *Rules*.	As detailed under 25 re emergency management, load or customer switching may be carried out in a load shed event by the DNSP without reference to the customer. It would be preferable for this to be explicitly recognised in the Rules rather than just the "catch-all" in (3).	50
37.	7.15.5	Access to data	Whilst this Section details who may be given data, there would appear to be no requirement here, or anywhere else in Chapter 7, for the MC to ensure delivery of metering data to the DNSP (or other parties). This is a fundamental of the current metrology model and whilst the AEMO Service Level Procedure specifies this requirement, this obligation should be recognised in the Rules. Refer submissions.	51
38.	7.15.5	Access to data	i) The are two different "processes" covered in this Section: 1 remote access to a meter to download data ie obtain directly the meter data 2 be provided with various data ie data delivered Although the outcome of these two processes is somewhat the same, ie the party gets the data, there are significant differences which are not recognised in	51

			this Section. 1 direct remote access to a meter to download data • Requires hardware and communication channel and passwords etc. • Only gives access to meter data ie meter reading in the meter • Is inappropriate for most of the parties listed – this clause was to allow a large customer to 'bipass" the need to get data through the site's MDP, but rather to get live data themselves. Not applicable to some other parties eg not applicable to the ombudsman, the AER. Almost certainly not used by most other parties eg retailers, MCs, NSPs, AEMO etc. 2 be provided with various data ie data delivered • Applicable to all the parties listed • Delivers metering data, NMI standing data, meter register data as mandated or as negotiated. • Note only AEMO has access to and can hence deliver settlement ready data This section should be redrafted with this in mind. ii) A related aspect with respect to this Section is that there is a range of terminology used when referring to these two matters. Hence: • in (a) when referring to delivery of data to a party the term is "receive"; • in (a)(9) the term for the same is "accessing	

			the metering data" [very similar to the term in (a) for accessing the meter for meter data]; • in (c) (2) the term is "entitled to receive" • in (d) the term is "access is provided" It would be preferable if consistent terminology was used for each of the two processes covered. iii) It is noted that in our interpretation, nothing in this Section obliges a party to give access to or deliver data to another party. If the regulatory framework obliges a party to give access to a meter or deliver data to a party these obligation are elsewhere in the regulatory framework. The DNSPs consider that the Rules should mandate metering data delivery to DNSPs. Refer submissions.	
39.	S7.2.5	**S7.2.5 Capabilities of Metering Providers for small customer metering installations** Category 4S *Metering Providers* must be able to exhibit, to the reasonable satisfaction of *AEMO*: (a) all of the capabilities in S7.2.3; and (b) the establishment of an appropriate security control management plan and associated infrastructure and communications systems for the purposes of preventing unauthorised local access or remote access to *metering installations*, services provided by *metering installations* and *energy data* held in *metering installations*.	i) Hence the MP needs to have the capability (and be accredited?) for metrology (S7.2.3) and security, but does NOT have to demonstrate any capabilities to support the MC is meeting the requirement for ensuring the capability for Minimum Service Specification services. Refer also item 1 and Victorian DNSP submission. ii) Clause (b) provides some security obligations over and above those in the 7.15.3. Does this imply that the for smart meter installations the security requirements are more than that for type 1-4, 5 and 6 meter installations? Why would that be the case? Shouldn't the obligations re security be consistent across all meter types?	52, 53

<table>
<tr>
<td>40.</td>
<td>S7.3.2</td>
<td>
S7.3.2 Categories of registration
Categories of registration are set out in Table S7.3.2.1.
Table S7.3.2.1 Categories of registration for accreditation
<table>
<tr><th>Metering installation type</th><th colspan="2">Categories of registration</th></tr>
<tr><td>1, 2 3 and/or 4</td><td>Category 1D, 2D, 3D and/or 4D (for remote acquisition, processing</td><td>Category 4S (for small customer metering installations)</td></tr>
<tr><td></td><td>and delivery of metering data for connection points)</td><td></td></tr>
</table>
</td>
<td>The wording in the second column re Category 1D-4D, should appear in the third column with respect to Category 4S.</td>
<td>_</td>
</tr>
<tr>
<td>41.</td>
<td>S7.3.2</td>
<td>
<table>
<tr><td></td><td>connection points)</td><td></td></tr>
<tr><td>4A, 5 and/or 6</td><td>Category 4AC, 5C and/or 6C (for manual collection or remote acquisition of metering data)</td><td>Category 4AD, 5D and/or 6D (for manual collection, processing and delivery of metering data) (for remote acquisition, processing and delivery of metering data)</td></tr>
</table>
</td>
<td>Wording:
Category 4AD, 5D and/or 6D (for manual collection, processing and delivery of metering data) or (for remote acquisition, processing and delivery of metering data)</td>
<td>55</td>
</tr>
</table>

42.	S7.3.4	**S7.3.4 Capabilities of Metering Data Providers for small customer metering installations** Category 4S *Metering Data Providers* must be able to exhibit, to the reasonable satisfaction of *AEMO*: (a) all the capabilities in S7.3.3; and (b) the establishment of an appropriate security control management plan and associated infrastructure and communications systems for the purposes of preventing unauthorised local access or remote access to *metering installations*, services provided by *metering installations* and *energy data* held in *metering installations*.	i) Hence the MDP needs to have the capability (and be accredited?) for metrology (S7.2.3) and security, but does NOT have to demonstrate any capabilities to support the MC is meeting the requirement for ensuring the capability for Minimum Service Specification services. Refer also item 1, 39 and Victorian DNSP submission. ii) Clause (b) provides some security obligations over and above those in the 7.15.3. Does this imply that the for smart meter installations the security requirements are more than that for type 1-4, 5 and 6 meter installations? Why would that be the case? Shouldn't the obligations re security be consistent across all meter types?	56

43.	S7.4.3		Type 4 is a remote read meter. It is not a type 4A meter which does not communications. The reference to clause 7.10.6(d) hence makes no sense, as this clause deals with type 4A or an installation that does not have remote acquisition ?!	57	

4	less than 750 MWh (Item 2)	1.5	n/a	Either 0.5 CT and 1.0 *meter* Wh; or whole current general purpose *meter* Wh: • meets requirements of clause 7.8.2(a)(9); and • meets the requirements of clause 7.10.6(d). (Item 1)	±20 (Item 2a)

7.10.6(d)

(d) Where the *metering installation* is a type 4A *metering installation* or does not have the capability for *remote acquisition* of *metering data*, the *Metering Coordinator* must ensure that *metering data* is provided to *AEMO* and that the data:

(1) is derived from a *metering installation* compliant with clause 7.8.8(a);

(2) provided within the timeframe required for *settlements* specified in the *metrology procedure* and the relevant *service level procedures*;

(3) is actual, substituted or estimated in accordance with the *metrology procedure*; and

(4) provided in accordance with the performance standards specified in the *metrology procedure*.

44.	S7.4.3		4A	less than 750 MWh	1.5	n/a	Either 0.5 CT and 1.0 *meter* Wh; or whole current general purpose *meter* Wh: • meets the requirements of clause 7.8.2(a)(10); and • has the capability of providing the services in table S7.5.1.1; and	±20 (Item 2a)	Allowing a type 4A manually read meter up to 750MWh appears to be a significant downgrading of the settlement data requirements. Currently for meters above 160MWh (x and y factors) market data is required to a time schedule which can only be practically met by remote read meters.	-
45.	S7.4.3		5	less than x MWh (Item 3)	1.5 (Item 3b)	n/a	Either 0.5 CT and 1.0 meter Wh; or whole current connected general purpose meter wh: • meets requirements of clause 7.8.2(a)(10); and • meets the requirements of clause 7.10.6(d) (Item 1)		Missing clock error requirements	59

46.	S7.5.1	**S7.5.1 Minimum services specification** A *metering installation* meets the *minimum services specification* if it is: (a) capable of providing the services listed in table S7.5.1.1 in accordance with the procedures made under clause 7.8.3; and (b) connected to a *telecommunications network* which enables remote access to the *metering installation*.	The simple requirement to have a connection to a telecommunications network is not sufficient detail to ensure that the MC's end to end solution has capability to deliver smart meter services. The capacity and reliability of the network must be suitable to deliver the services at the specified service measures. Refer Victorian DNSP's submission.	60

<table>
<tr>
<td>47.</td>
<td>S7.5.1.1</td>
<td>
<table>
<tr>
<td>(c) remote on-demand meter read service</td>
<td>The remote retrieval of metering data for a specified point or points in time and the provision of such data to the requesting party. The service includes the retrieval and provision of:
• reactive energy metering data and/or active energy metering data (for imports and/or exports of energy measured by the meter);
• interval metering data and cumulative total energy measurement for the metering installation; and
• accumulated metering data at the start and the end of the period specified in the request.</td>
<td>Parties listed in clause 7.15.5(a)</td>
</tr>
</table>
</td>
<td>i) It is our understanding that all smart meters will store and deliver active energy data as the base level service, but reactive and/or generation metering data storage and forwarding will be activated by a setting in the meter.
So the service would be “active energy data and on request reactive energy and/or generation”,

ii) “cumulative total energy measurement” needs to be defined it is not an industry accepted term

ii) “accumulated metering data at the start and end of the period specified” again needs further definition as it is not a clearly accepted industry term. If this is the index read then the standard practice in Victoria is for this to be stored at midnight and be available with every set of daily interval data.</td>
<td>62, 63, 64</td>
</tr>
<tr>
<td>48.</td>
<td>S7.5.1.1</td>
<td>As above for (d)</td>
<td></td>
<td></td>
</tr>
</table>

49.	S7.5.1.1	(e) *metering installation* inquiry service The remote retrieval of information from, and related to, a specified *metering installation* and the provision of such information to the requesting party. The *metering installation* must be capable of providing the following information, as a minimum, when requested: *Local Network Service Provider* *financially responsible Market Participant* A person to whom a *small customer* has given its consent under clause 7.15.4(b)(2)	i) The phrase "The remote retrieval of information from, and related to, a specified metering installation …..". is not used in relation to other services. It is unclear what this differential wording is specifying re this service compared with the other services. If there is not a differential, then common wording should be used. ii) The DNSPs have some concerns re the limited services in the MSS. Refer submissions. However with respect to this specific service the AEMO Service Advice clearly identified the "metering installation enquiry service" as both an instant service but also as a scheduled service ie "set and forget". Access to this data on a scheduled basis is a key driver of network benefits. Is the specification of this as a "requested service" only an oversight? or a departure from the AEMO Service Advice?	65, 66
50.	S7.5.1.1	(e) *metering installation* inquiry service	i) The AEMO Service Advice included power factor; is the omission of this only an oversight? or a departure from the AEMO Service Advice? ii) The voltage, current, power, frequency should be specified as instantaneous and coincidental across all these quantities. iii) The term "metering device temperature alarm" needs defining as it is not an industry accepted term	67, 68, 69

51.	S7.5.1.1	(e) *metering installation* inquiry service	i) The AEMO Service Advice included power factor; is the omission of this only an oversight? or a departure from the AEMO Service Advice? ii) The voltage, current, power, frequency should be specified as instantaneous and coincidental across all these quantities. iii) The term “metering device temperature alarm” needs defining as it is not an industry accepted term	67, 68, 69

52.	S7.5.1.1	temperature alarm. (f) advanced *meter* reconfiguration service: The remote setting of the operational parameters of the *meter*. • thresholds for the tamper detection alarm, reverse energy flow alarm and *metering* device temperature alarm referred to in the *meter installation* inquiry service; and	i) There are more than these items within the meter installation inquiry service which will have a need to be configured. ii) Further there has been a strong argument for inclusion in the meter re-en service the associated auto disconnect service (ie load/current detected). This service element will have a number of current and time settings. • Settings and thresholds for the tamper detection alarm, reverse energy flow alarm and *metering* device temperature alarm, contents of the meter log referred to in the *meter installation* inquiry service; • Settings and thresholds for the auto disconnect service referred to in the remote reconnection service, and iii) Also the access to power quality data (volts, amps, etc) on a scheduled basis will likely have a series of parameters which require to be set to enable the service.	70, 71
NERR				

53.	104	(1) If the distributor de-energises a customer's premises in accordance with the energy laws, the distributor must notify the retailer of the de-energisation (including whether the premises were de-energised manually or remotely), and the reason for the de-energisation, as soon as practicable, except where the de-energisation is as a result of the retailer's request. (2) If the retailer arranges to de-energise a customer's premises remotely in accordance with the energy laws, the retailer must notify the distributor of the remote de-energisation, and the reason for the de-energisation, as soon as practicable.	Similar to (1) should (2) conclude with the phrase "except where the de-energisation is as a result of the distributor's request" ?	6